

Patrick J. Reilly
Nevada Bar No. 6103
Monique S. Jammer
Nevada Bar No. 15420
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway
Suite 1600
Las Vegas, Nevada 89106
Telephone: 702.382.2101
Facsimile: 702.382.8135
preilly@bhfs.com
mjammer@bhfs.com

Attorneys for American Education Services, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

AMANDA DAVIS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

AMERICAN EDUCATION SERVICES LLC;
KEYCORP FINANCIAL, INC. dba
KEYBANK,

Defendants.

Case No. 2:22-cv-01645-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT**

(First Request)

STIPULATION

Plaintiff Amanda Davis (“Plaintiff”), by and through her counsel of record, George Haines, Esq., of Freedom Law Firm, and, Defendant American Education Services LLC (“AES”), by and through its counsel of record, Patrick J. Reilly, Esq., of the law firm of Brownstein Hyatt Farber Schreck, LLP, hereby stipulate and agree as follows:

1. On September 28, 2022, Plaintiff filed her Complaint For Damages (the “Complaint”). ECF No. 1.
2. On or about October 3, 2022, Plaintiff served the Summons and Complaint on AES.
3. The current deadline for AES to respond to Plaintiff’s Complaint was October 24, 2022.

4. Plaintiff has agreed to grant an extension for AES to answer, or otherwise plead in response to the Complaint, to allow the parties to investigate the matter and discuss potential resolution.

5. AES shall have up to, and including, November 7, 2022, in which to answer or otherwise plead in response to Plaintiff's Complaint.

6. This stipulation is one day late. Though Plaintiff's counsel had agreed informally to a stipulation to extend this deadline, counsel for AES was unable to obtain approval on the form of stipulation until the morning of October 25, 2022. Counsel apologizes to the Court for this delay.

7. This stipulation is brought in good faith by all parties and not for purposes of delay. This extension will not result in any undue delay in the administration of this case.

8. This is the first request for extension of time requested by the parties with respect to responding to the Complaint.

DATED this 24th day of October, 2022.

DATED this 24th day of October, 2022.

/s/ Patrick J. Reilly

Patrick J. Reilly, Esq.
Monique S. Jammer, Esq.
BROWNSTEIN HYATT FARBER
SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106

*Attorneys for American Education
Services LLC*

/s/ Gerardo Avalos

George Haines, Esq.
Gerardo Avalos, Esq.
FREEDOM LAW FIRM
8985 S. Eastern Avenue, Suite 350
Las Vegas, NV 89123

Attorneys for Amanda Davis

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: October 25, 2022